IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: BPS DIRECT, LLC and CABELA'S, LLC, WIRETAPPING

MDL NO. 3074 2:23-md-03074-MAK

CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. Civ. P. 7.1, Defendant Cabela's LLC discloses it is wholly-owned by Bass Pro, LLC. No publicly held corporation owns 10% or more of its stock. Pursuant to Fed. R. Civ. P. 7.1(a)(2), Cabela's LLC states that is a Missouri citizen for purposes of diversity jurisdiction. Cabela's LLC is wholly-owned by Bass Pro, LLC, which is wholly-owned by Huntsman Holdings, LLC. Huntsman Holdings, LLC is an indirect, wholly-owned subsidiary of American Sportsman Holdings Co., a Missouri corporation with its principal place of business at 2500 E. Kearney St., Springfield, Missouri.

Pursuant to Fed. R. Civ. P. 7.1, Defendant BPS Direct, LLC discloses it is wholly-owned by Bass Pro, LLC, which is wholly owned by Huntsman Holding, LLC. No publicly held corporation owns 10% or more of BPS Direct, LLC's stock. Pursuant to Fed. R. Civ. P. 7.1(a)(2), BPS Direct, LLC states that is a Missouri citizen for purposes of diversity jurisdiction. BPS Direct, LLC is wholly-owned by Bass Pro, LLC, which is wholly-owned by Huntsman Holdings, LLC. Huntsman Holdings, LLC is an indirect, wholly-owned subsidiary of American Sportsman Holdings Co., a Missouri corporation with its principal place of business at 2500 E. Kearney St., Springfield, Missouri.

Pursuant to Fed. R. Civ. P. 7.1, Defendant Cabela's Retail MO, LLC discloses it is wholly-owned by Cabela's Wholesale, L.L.C. No publicly held corporation owns 10% or more of its stock. Pursuant to Fed. R. Civ. P. 7.1(a)(2), Cabela's Retail MO, LLC states that

is a Missouri citizen for purposes of diversity jurisdiction. Cabela's Retail MO, LLC is wholly-owned by Cabela's Wholesale, L.L.C., which is wholly-owned by Bass Pro Outdoor World, LLC, which is wholly owned by Bass Pro, LLC. Bass Pro, LLC, is wholly owned by Huntsman Holdings, LLC, which is an indirect, wholly-owned subsidiary of American Sportsman Holdings Co., a Missouri corporation with its principal place of business at 2500 E, Kearney St., Springfield, Missouri.

June 30, 2023

Respectfully Submitted,

By: /s/ Jennifer A. McLoone
Jennifer A. McLoone (PHV)
Shook, Hardy & Bacon L.L.P.
201 South Biscayne Boulevard
Suite 3200

Miami, FL 33131-4332 Phone: (305) 358-5171 Fax: (305) 358-7470

Email: jmcloone@shb.com

Erin (Loucks) Leffler (PA ID No. 204507) Shook, Hardy & Bacon L.L.P. Two Commerce Square 2001 Market St., Suite 3000 Philadelphia, PA 19103

Phone: (215) 278-2555 Fax: (215) 278-2594 Email: eleffler@shb.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I, hereby certify that on June 30, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of each such filing to all CM/ECF participants.

/s/ Jennifer A. McLoone
Jennifer A. McLoone